

**Edwards, Gary**

**DEFENDANT'S  
EXHIBIT**

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**From:** Leonard Bennett <lenbennett@clalegal.com>  
**Sent:** Sunday, March 04, 2012 8:43 PM  
**To:** Edwards, Gary  
**Subject:** Re: Victoria Frazier v. Litton (Some "Housekeeping" Matters)

Gary -

Let's start with 3. We can't move trial. Not in the EDVA. Not with Judge Spencer.

Re: 1 and 2. Part of our confidence in our position is the lack of discovery by Defendant. The case was off balance before you even got in. We have our third party discovery now done. We made our disclosures. Litton has not disclosed a thing.

Our reply is due Monday. We need to resolve it early today.

Len

Sent from my iPhone

On Mar 1, 2012, at 3:16 PM, "Edwards, Gary" <[gedwards@bakerdonelson.com](mailto:gedwards@bakerdonelson.com)> wrote:

Len -

A couple of housekeeping matters. I know that we are still engaging in negotiations, but I have some additional information/inquiries to pass along in case we do not reach a resolution:

1. I can make a 30(b)(6) witness available on 3/21 at 10 a.m. for a deposition. The witness needs to fly out that afternoon, so if that does not give you enough time to do your deposition, then let me know and I will request another date. What is the location in Richmond for the deposition?
2. Will you make the Fraziers available for a deposition of each on 3/22?
3. Are you wed to the 4/9 trial? Or do you have an interest in setting it out a couple of months so that there is some additional time for this discovery should we not reach a resolution.

Regards

Gary Edwards, Esq.  
Baker Donelson  
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